

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LARRY JONES, et. al.,)	
Plaintiffs,)	08 C 413
)	
v.)	
)	Judge LINDBERG
)	
CITY OF CHICAGO, et. al.,)	Magistrate Judge ASHMAN
Defendants.)	

**CITY OF CHICAGO’S AGREED MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant, City of Chicago (“City”), by its attorney, Mara S. Georges, Corporation Counsel, with Plaintiffs’ agreement respectfully requests this Honorable Court for an extension of time up to and including March 13, 2008, in which to answer or otherwise plead to Plaintiffs’ Complaint.

In support of this motion, Defendant states:

1. This matter was filed on September 5, 2007, in the Circuit Court of Cook County, Illinois. On or about January 18, 2008, this matter was removed to the United States District Court for the Northern District of Illinois.
2. Assistant Corporation Counsel Rita Moran was assigned the case on February 13, 2008.
2. The undersigned has not yet had an opportunity to order any of the Chicago Police Department records to enable Defendant to properly respond to Plaintiff’s Complaint.
3. This motion is Defendant’s first request for an extension of time to answer or

otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice Plaintiffs.

5. Plaintiffs' counsel was informed of this motion on February 13, 2008, and does not oppose Defendant's request.

WHEREFORE, Defendant, City of Chicago, with Plaintiffs' agreement, respectfully requests that it be given until March 13, 2008, to answer or otherwise plead to Plaintiffs' Complaint.

Respectfully Submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Rita Moran
RITA MORAN
Assistant Corporation Counsel
Attorney for Defendant City of Chicago

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Suite 1020
Chicago, IL 60602
(312) 742-9866
Attorney No. 06270301

CERTIFICATE OF SERVICE

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon the person(s) named in the Notice of Motion, who is a "Filing User" pursuant to ECF, in accordance with the rules of electronic filing of documents, and Robert W. Smith, 320 S. Westmore, Lombard, IL 60148, on this 14th day of November, 2007.

/s/ Rita Moran

RITA MORAN

Assistant Corporation Counsel

Attorney for Defendant City of Chicago